

LAW OFFICE OF BERNARD V. KLEINMAN, PLLC

ATTORNEY - AT - LAW

108 VILLAGE SQUARE, SUITE 313

SOMERS, NY 10589-2305

TEL: (914) 644-6660 E-MAIL: ATTRNYLWYR@YAHOO.COM FAX: (914) 694-1647

November 23, 2022

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Courtroom 6C-S
Brooklyn, New York 11201

Re: *LaNasa, et al. v. Stiene*, 22-cv-5686

Your Honor:

This law firm represents the Plaintiffs in the above-captioned action.

By this letter I would respectfully request permission to respond to Attorney Schneider's Letter Motion of November 21, 2022 (ECF No. 14), until Monday, November 28, 2022, before the Court makes any ruling on the Motion.

This Letter Motion merits being directly addressed on a number of bases including, but not limited to:

- a. the failure to confer with opposing counsel before the filing of the motion;
- b. direct violation of the previously entered into Stipulation; and
- c. late filing of the Letter Motion.

Attorney Schneider has arbitrarily (and discourteously and unprofessionally) set a number of dates in his Letter Motion, without even bothering to confer with Plaintiffs' counsel. Furthermore, the Letter Motion contains a number of libelous statements that need to be addressed, that Attorney Schneider has seen fit to make, under the protection of immunity conferred by judicial filings.

I request this additional time within which to respond (and make any other applications under the Rules) due to my current schedule, the upcoming holidays.

Your attention to this request is greatly appreciated.

Respectfully submitted,

/s/ Bernard V. Kleinman

Bernard V. Kleinman, Esq.

Attorney for Plaintiffs

cc: All counsel of record by ECF